

To Whom It May Concern:

Speaking as a cattleman, initially I was opposed to the National Animal Identification System (or Program). However, as we lose our ability to traceback beef cattle through the marketing system with the eradication of Brucellosis and Tuberculosis (and the loss of the identification systems in use with those programs), we do need some form of a traceback system when a diseased animal or carcass is diagnosed.

I am not sure 48 hour traceback is a "do-able goal" but some form of traceback is assured. Currently we have very little. If anyone disputes the need to be able to traceback a diseased animal or carcass we need to only look to the recent problems in tracing back the animals associated with the 2003 BSE case in Washington state or more recently tracing tuberculosis cases in my own state of Texas. Not being able to traceback has caused us the loss of export markets and again in my own state the potential hardship of increased costs of testing breeding and feeder cattle for interstate shipment

My concerns are that we are: 1. That a relatively simple idea (identification of every animal or group of animals) has become extremely complicated as allied industry (tag companies, record keeping systems, data software providers, etc) race to provide all the "bells and whistles" to make the system more attractive (to some) and more costly (to all); 2. That we are sidetracked by "turf wars" on data confidentiality and data storage and access that should belong solely to USDA/APHIS and their colleagues in the states, namely the state animal health agencies; 3. That we are taking too long to implement even the most basic form of identification, i.e., the premise identification or registration because of lack of information, confusing information, and misinformation; and 4. That anyone ever thought the federal or state governments would pay for most if not all the program (we can't get adequate funding for children's education or health insurance much less Brucellosis vaccinations and we expect funding for a national animal identification program?).

I am not sure exactly what the cost will be, some hundred million dollars to initiate the program and probably about 100 million dollars or more annually (I have never seen an estimate), this will be and should be paid for by beef cattle producers for our benefit and the benefit of our customers.

I am no longer opposed to the program, the benefits outweigh the ultimate costs of NOT being able to traceback a diseased animal or carcass, and just the economic costs of quarantines if not the actual costs of the animals can justify the program. I do ask that we try (in as much as possible) to keep it simple, cheap, and effective because we are not just talking about the larger ranches, the feedyards, and beef processing plants but many tens (possibly hundreds) of thousands of smaller places that cattle are raised, grown and shown, often numbering just a few head, all of which will enter the marketing chain at some point and need to be tagged or identified. Not everyone has a squeeze chute or a tagger much less an RFID reader.

I think that public comment is good and both sides need to be heard but when it is all said and done, if we are going to do this then lets get going but keep it simple, cheap and effective.

Thank you.

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